

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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JUN 30 1994

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of	)	
	)	
Administration of the	)	CC Docket No. 92-237
North American Numbering Plan	)	Phases One and Two
	)	

**REPLY COMMENTS OF AMERITECH**

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Dated: June 30, 1994

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REPLY COMMENTS OF AMERITECH

I. INTRODUCTION

Ameritech respectfully submits these Reply Comments in the above-captioned matter. The comments generally confirm that the industry "has reached consensus on a number of questions concerning NANP administration."<sup>1</sup> As discussed in Ameritech's initial Comments<sup>2</sup>, further consensus is clearly possible. The Commission's planned approach, i.e., continuing to focus its scarce resources at the policy level and allowing the industry to proceed with its efforts to reach consensus on open issues,<sup>3</sup> should be implemented by advising the Future of Numbering Forum ("FNF") to reconvene<sup>4</sup>, and charging the FNF with preparing detailed proposals regarding key elements of the NANP administration addressed in this docket within a specific time period (for example, six months). Where necessary

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<sup>1</sup> Comments of AT&T, at 9.

<sup>2</sup> Comments of Ameritech, at 8.

<sup>3</sup> NPRM, at 8 (para. 24).

<sup>4</sup> Comments of USTA, at 9-10.

and as indicated by the record in this proceeding, the Commission should provide any necessary policy input to allow the process to continue.

To that end, the Commission should utilize the Comments as a measure of where consensus has been reached or is near, and where its policy guidance may be necessary. The balance of these Reply Comments suggest areas in which further industry consensus is likely with Commission guidance.

## II. OVERALL NANP ADMINISTRATION STRUCTURE

Most commenting parties call for an open industry forum (i.e, one involving all interested parties) to be charged with the generic functions of overseeing ministerial NANP administration, oversight/policy creation, and subject matter expert groups.<sup>5</sup> Ameritech supports this overall structure and urges the Commission and other WZ1 countries to endorse it broadly while charging the industry, via FNF, to reach timely closure on the details of such a structure.

## III. SPONSORSHIP

Ameritech concurs with the parties expressing agreement that ATIS is an appropriate sponsoring entity. In its comments, ATIS expressed its willingness "to sponsor a committee which would develop and coordinate numbering policy ...".<sup>6</sup> The Commission should accept ATIS' proposal and authorize it to initiate the necessary steps to bring the existing FNF activities under its sponsorship.

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<sup>5</sup> Comments of AT&T, at 10; Comments of Sprint, at 9; Comments of ATIS, at 6; Comments of Teleport, at 5-8.

<sup>6</sup> Comments of ATIS, at 1; see also Comments of USTA, at 1; Comments of US West, at 3.

#### IV. NANP ADMINISTRATION

The point of broadest agreement among the parties is that the ministerial functions of day to day numbering administration should be performed by an independent third party.<sup>7</sup> To that end, the Commission and other regulatory bodies within WZ1 should change the industry with preparing a detailed RFP, and accept ATIS' offer to oversee the selection of a neutral, third-party NANP administrator ...".<sup>8</sup>

#### V. DISPUTE RESOLUTION

Commentors offer mixed views on the subject of dispute resolution. Some support various mechanisms. Others express the view that the industry is ill equipped to resolve highly contentious numbering issues and argue that extensive, direct FCC involvement in the dispute resolution process is necessary.<sup>9</sup> The latter view may be overly simplistic given that dispute resolution of all WZ1 numbering issues cannot, as a practical matter, be adjudicated by the FCC unilaterally.

However, proponents of both views necessarily agree that the essential ingredient of such a process is timeliness. Ameritech agrees, and submits that a properly designed industry process can accommodate the vast majority of issues without daily Commission involvement, and can also agree upon a dispute resolution process.

The preferred regulatory role would be to provide the industry with "direction and decision as to a timely dispute resolution mechanism, process,

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<sup>7</sup> Comment of APCC, at 2; Comments of PCIA, at 2; Comments of NARUC, at 4; Comments of Ad Hoc, at 4.

<sup>8</sup> Comments of ATIS, at 1.

<sup>9</sup> Comments of MCI, at 10; Comments of NATA, at 3-6; Comments of McCaw, at 1-2.

and procedure ...".<sup>10</sup> Given such direction from the Commission and other regulatory bodies within WZ1, Ameritech is confident the industry can implement such policies and integrate them into the overall WZ1 numbering organization structure with a minimum of dispute.

## VI. FUNDING ISSUES

Funding represents another sub-issue for which the Comments reflect broad agreement in principle but a shortage of agreement upon detail. Most parties support funding mechanisms which address recovery of costs associated with both policy development and day-to-day administration. General agreement is also apparent regarding the desire to apply any fees to all entities utilizing NANP resources. As in the case of dispute resolution, the Commission's role in resolving the funding issues should be to prescribe appropriate policy principles and objectives such that the industry itself can proceed to develop the required details. As noted in the comments, several parties recognize substantial progress in the work of the FNF subgroup which has been addressing this issue.<sup>11</sup> Ameritech supports continuation of this FNF work, to culminate in a related recommendation to the Commission and other WZ1 regulatory bodies within a reasonable time frame.

## VII. CENTRAL OFFICE CODE ADMINISTRATION

Many commentators advocate centralizing the central office (CO) code administration function, especially entities who do not perform the function

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<sup>10</sup> Comments of ATIS, at 9.

<sup>11</sup> See, e.g., Comments of AT&T, at 12.

today.<sup>12</sup> However, several commentators who have experience performing the function express the view that any decision to centralize central office code administration should be made after the implementation of the new NANP.<sup>13</sup> For example, Bell Atlantic argues that CO code administration is, in many ways, more complex than the national administration function.<sup>14</sup>

Those who oppose centralization argue that area code planning and associated splits are essentially state issues, that CO code administration is closely aligned with local network specifics, that the level of detail involved would make it difficult to perform at a national level, and that these factors would make a transition to national centralization unduly complicated.<sup>15</sup>

For the reasons stated in its Comments, Ameritech has announced its intention to migrate the CO Code administration function to a third party.<sup>16</sup> Ameritech further stated that it was working with its state commissions to develop a plan to migrate the function.<sup>17</sup> This transition may or may not involve centralization within the Ameritech region. As discussed in Ameritech's initial Comments, any CO Code administration plan must recognize the local nature of these codes, and must provide for state-level regulatory involvement.<sup>18</sup>

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<sup>12</sup> Comments of MFS, at 4; Comments of MCI, at 6-7; Comments of Teleport, at 5; Comments of Airtouch, at 4.

<sup>13</sup> See, e.g., Comments of SWBT, at 11; Comments of US West, at 9-11; Comments of Bell Atlantic, at 4; Comments of NYNEX, at 11.

<sup>14</sup> Comments of Bell Atlantic, at 4.

<sup>15</sup> See, e.g., Comments of Pacific Bell, at XX.

<sup>16</sup> Comments of Ameritech, at 4.

<sup>17</sup> Ibid.

<sup>18</sup> Comments of Ameritech, at 6

However, should the Commission seek to act upon its tentative conclusion to centralize this function, some time lag in the transfer is advisable. As an administrator itself, Ameritech knows that the function is more complex than is generally understood by many commentators. To mandate this task on top of the migration of the NANP administration function would be doubly difficult and result in the loss of a significant element of consistency and experience at this critical time.

At a minimum, the Commission should defer its decision on centralization pending: (1) the successful transfer of NANP administration functions, and (2) completion of a separate FCC proceeding from which a more detailed record can be created. Such a separate proceeding would allow the states and local governments (who are most impacted by local NPA planning decisions) to participate more actively.

#### VIII. UNIFORM DIALING PLAN

No "uniform nationwide dialing plan" (using the digit "1" as a toll indicator) should be mandated by the Commission at this time. As stated in Ameritech's initial Comments, the local character of dialing plan issues has traditionally required local solutions. For example, state regulators have worked with Ameritech to implement dialing plan changes in 9 NPAs within the region served by Ameritech, and the remaining NPAs are now in a permissive dialing period in preparation for conversion to INPA.<sup>19</sup> In further cooperation with state regulators, Ameritech is planning for a uniform dialing plan which will allow 1 + 10 digit dialing for all calls on a permissive basis.

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<sup>19</sup> Comments of Ameritech, at 6.

Sprint argues that it would be efficient and economical to have converted to a uniform dialing plan before 7-digit toll dialing is implemented.<sup>20</sup> This view ignores the local character of effective dialing plan solutions. In any case, it is too late to follow this advice; only 6 months remain before the implementation of INPA, for which implementation is already under way as described above.

#### IX. CIC TRANSITION PERIOD

The comments do not provide a factual basis upon which the Commission can reasonably specify the appropriate transition period. However, the Commission should take careful note of Bellcore's comments, which point out that the "length of the (transition) period itself...can last no longer than the supply of expanded Feature Group (FG) D CICs in the 5000 and 6000 ranges."<sup>21</sup> In other words, as a practical matter, the end date of any transition period will depend on the rate of CIC consumption. While there may be debate as to the rate itself, the fact remains that 5000/6000 CIC exhaust effectively ends the transition period.

Ameritech continues to support a 36 month transition period as one which balances the interests of all parties. However, it must be noted that any acceleration (such as may result from the implementation of the 500 SAC) in the rate of consumption would make the Commission's tentative transition

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<sup>20</sup> Comments of Sprint, at 13. Use of the digit "1" should theoretically increase network efficiency, but not because of its use as a toll indicator. Use of the leading digit "1" allows switches to distinguish between 7-digit and 10-digit calls -- not between local and toll calls, as Sprint suggests.

<sup>21</sup> Comments of Bellcore, at 8; see also Comments of US West, at 15; Comments of USTA, at 10-11.



period of six years unworkable. As noted by Bellcore, other events may result in a further increase in the demand rate.<sup>22</sup>

A more rational approach may be to have the NANP monitor the demand and advise the industry, at an agreed upon pre-exhaust trigger point, that it must implement the transition. Such an approach is currently being used to advise the industry of the commencement of four digit CIC assignments. In the alternative, if the Commission nevertheless elects to adopt a specific transition period, it should charge the industry with developing a usage monitoring plan, with a triggering mechanism that will ensure a transition before the exhaust of the 5000 and 6000 ranges of CICs.

#### X. INTERSTATE INTRALATA PRESUBSCRIPTION

Ameritech continues to strongly urge that no precipitous action be taken regarding the advisability of modifying the current treatment of interstate intraLATA toll traffic. The issues inherent in such a step, would, undeniably, affect the fundamental structure of the local exchange marketplace, to the serious detriment of LECs' customers.<sup>23</sup> Offhand consideration of such momentous topics in the current proceeding, which was initiated "[t]o explore issues pertaining to future administration of ... numbering resources under the NANP"<sup>24</sup> would be ill-advised to say the least. As discussed in Ameritech's initial Comments,<sup>25</sup> a much broader vehicle of inquiry is

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<sup>22</sup> Comments of Bellcore, at 9.


<sup>23</sup> Predictably, those most loudly advocating such action are currently poised to enter the local exchange business on a large-scale basis. See, e.g., Comments of MCI, at 17-18; Comments of MFS, at 6-7; Comments of AT&T, at 2, 4-6.

<sup>24</sup> NPRM, at 2 (para. 1).

<sup>25</sup> Comments of Ameritech, at 9.

appropriate and, indeed, exists before the Commission today in the form of the Customers First proceeding.<sup>26</sup>

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Frank Panek/ra", written over a horizontal line.

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Dated: June 30, 1994

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<sup>26</sup> In the Matter of a Petition for a Declaratory Ruling and Related Waivers to Establish A New Regulatory Model for the Ameritech Region, DA-93-481.

CERTIFICATE OF SERVICE

I, Kimberly M. Gurrieri, do hereby certify that a copy of the foregoing pleading has been served on all parties by first class mail, postage prepaid, on this 30th day of June 1994.

Kimberly Gurrieri Ha  
Kimberly M. Gurrieri